

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**BAY STATE GAS COMPANY**

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) **D.T.E. 02-75**  
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**DIVISION OF ENERGY RESOURCES' THIRD SET OF  
INFORMATION REQUESTS**

**Instructions**

For the purpose of the Massachusetts Division of Energy Resources' ("DOER") Second Set of Information Requests ("Requests"), any reference to the "Company" or "Bay State" shall mean Bay State Gas Company.

DOER requests that Bay State submit complete and detailed responses to all Requests and include with such responses all relevant documentation.<sup>1</sup>

Please provide each response on a separate page with the following:

1. A reference to the D.T.E. docket number;
2. A recitation of the Request to which Bay State is responding (including the information request identification/reference number; e.g. DOER 3-1), and;
3. The identification and business title and address of the person responding to the Request.

In order to expedite the review of the responses, please provide the responses as they are completed. Please do not wait for the completion of all responses.

DOER also requests that Bay State provide supplemental responses to these Requests if Bay State develops or obtains additional information within the scope of said Requests subsequent to the provision of the initial responses and prior to the close of the record in DTE 02-75.

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<sup>1</sup> "Documentation" includes, but is not limited to, writings, drawings, graphs, charts, photographs, phono-records, and other data compilations from which information can be obtained, translated, if necessary, by Bay State, through detection devices, into reasonably useable form.

If any of these Requests are ambiguous or need clarification in any way, please notify George Simmons, Division of Energy Resources, at 617-727-4732 ext. 130 in order to clarify the Request(s) prior to the preparing the response.

The following Requests address Bay State's proposed 10% Contingency Reserve, as described in pages 38 – 44 of the Company's filing.

### **Information Requests**

DOER 3 – 1: In response to DOER Information Requests 2-9 and 2-10, Bay State states that the proposed 10% contingency reserve was formulated through a qualitative analysis done by Bay State's management and that no quantitative assessment had been done.

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Describe all elements of the referenced "qualitative analysis" performed by Bay State's management resulting in the conclusion that the proposed 10% contingency reserve was the prudent course to take, including in your response: (1) the names, addresses and business titles of the management involved in the qualitative analysis and (2) all documents referring to or addressing such qualitative analysis.

Date: March 13, 2003